

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 20CR750</b>
<b>v.</b>	)	
	)	
<b>MILICA SUMAKOVIC,</b>	)	
	)	
<b>Defendant.</b>	)	

**AGREED MOTION TO EXPAND CONDITIONS OF BOND**  
**FOR DEFENDANT MILICA SUMAKOVIC**

Now comes Defendant, **MILICA SUMAKOVIC**, by and through her attorney, **RICHARD M. BEUKE**, and for her Agreed Motion to Expand Conditions of bond, states as follows:

1. Ms. Sumakovic has been charged with wire fraud and money laundering, charges that are pending in this Court.
2. Ms. Sumakovic is currently out on an unsecured bond with a curfew stipulation.
3. One condition of her bond is that she not communicate with her co-defendants.
4. Ms. Sumakovic's fiancé, Marko Nikolic, is a co-defendant in this case and Mr. Nikolic was sentenced on January 24, 2024.
5. Ms. Sumakovic is requesting permission to speak to her fiancé, Marko Nikolic, on phone calls and video calls.
6. The Government has no objection to Ms. Sumakovic and Mr. Nikolic communicating on the telephone and on video calls.
7. Pretrial does not have an objection with removing Marko Nikolic from Ms. Sumakovic's no contact list.

**WHEREFORE**, it is requested that the conditions of the Defendant's be expanded for the purpose of removing Marko Nikolic from Ms. Sumakovic's no contact list and she be allowed to speak to Marko Nikolic via telephone calls and video calls.

Respectfully Submitted,

/s/ Richard M. Beuke

Richard M. Beuke,  
Attorney for Defendant – Milica Sumakovic

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